

# **Exhibit 4**



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December 20, 2017

**By Certified Mail**

Office of Information Programs and Services  
A/GIS/IPS/RL  
Department of State, SA-2  
Washington, DC 20522-8100

Re: Freedom of Information Act Request

Dear FOIA Officer:

This is a request under the Freedom of Information Act, 5 U.S.C. §§ 552, et seq., for complete copies of the following records:

1. All correspondence with members or staff of the United States House of Representatives Committee on Oversight and Government Reform ("Committee") **between January 1, 2007 and June 30, 2008**, regarding the Committee's investigation into corruption in Iraq;
2. All documents produced to the Committee **between January 1, 2007 and June 30, 2008** in connection with the Committee's investigation into corruption in Iraq;
3. All documents and communications – including emails, transcripts, or interview notes – relating to testimony or interviews given by U.S. State Department employees – including Vincent Foulk, James Mattil, Christopher Griffith, or Arthur Brennan – to the Committee **between January 1, 2007 and June 30, 2008** in connection with the Committee's investigation into corruption in Iraq.
4. Any study, report, or publication: 1) dated **between January 1, 2006 and December 31, 2009**; 2) prepared/drafted, in whole or in part, by **ProCare Services** or **The International Drug Dispensary**; 3) concerning **Kimadia**, the Iraq Ministry of Health's state-owned import subsidiary.

Please search for responsive records regardless of format, medium, or physical characteristics. Where possible, **please produce records electronically, in PDF format**. We seek records of any kind, including electronic records, audiotapes, videotapes, and photographs. Our request

includes any letters, emails, facsimiles, telephone messages, voice mail messages, and transcripts, notes, or minutes of any meetings, telephone conversations, discussions, and any attachments to such records.

For any responsive records you deem covered by any applicable exemption, please provide an index of those documents as required under *Vaughn v. Rosen*, 484 F.2d 820 (D.C. Cir. 1973), *cert. denied*, 415 U.S. 977 (1972). As you are aware, a Vaughn index must describe each document claimed as exempt with sufficient specificity “to permit a reasoned judgment as to whether the material is actually exempt under FOIA.” *Founding Church of Scientology v. Bell*, 603 F.2d 945, 949 (D.C. Cir. 1979). The Vaughn index must also “describe each document or portion thereof withheld, and for each withholding it must discuss the consequences of supplying the sought-after information.” *King v. US Dep’t of Justice*, 830 F.2d 210, 223-24 (D.C. Cir. 1987) (emphasis added). Further, “the withholding agency must supply ‘a relatively detailed justification, specifically identifying the reasons why a particular exemption is relevant and correlating those claims with the particular part of a withheld document to which they apply.’” *Id.* at 224 (citing *Mead Data Central v. US Dep’t of the Air Force*, 566 F.2d 242, 251 (D.C. Cir. 1977)). See also *Johnson v. Exec. Office for U.S. Attorneys*, 310 F.3d 771, 776 (D.C. Cir. 2002). If you believe that some portions of the requested records are exempt from disclosure, please disclose any reasonably segregable non-exempt portions of the requested records. See 5 U.S.C. § 552(b). If you believe a document contains non-exempt segments, but that those non-exempt segments are so dispersed throughout the document as to make segregation impossible, please state what portion of the document is non-exempt, and how the material is dispersed throughout the document. *Mead Data Central*, 566 F.2d at 261. Claims of non-segregability must be made with the same degree of detail as required for claims of exemptions in a Vaughn index.

I am willing to pay fees for this request up to a maximum of \$200. If the fees for this request exceed that amount, please inform me first.

Thank you for addressing my request. You can reach me by email at the address below, or by phone at (202) 629-3530. You can mail responsive materials to the address above.

Sincerely,



Sarah L. Allen

sarah.allen@sparacinopllc.com